

GREENBERG TRAURIG, LLP
Kurt A. Kappes, CA Bar No. 146384
kappesk@gtlaw.com
Greg Sperla, CA Bar No. 278062
sperlag@gtlaw.com
1201 K Street, Suite 1100
Sacramento, California 95814
Telephone: (916) 442-1111
Facsimile: (916) 448-1709

ANDERSON & KARRENBURG
Thomas R. Karrenberg (*admitted pro hac vice*)
tkarrenberg@aklawfirm.com
Heather M. Sneddon (*admitted pro hac vice*)
hsneddon@aklawfirm.com
Samantha J. Slark (*admitted pro hac vice*)
sslark@aklawfirm.com
50 West Broadway, Suite 700
Salt Lake City, Utah 84101
Telephone: (801) 534-1700
Facsimile: (801) 364-7697

Attorneys for Defendants
KARMA TECHNOLOGIES, LLC
JOHN DAVID BIGGERS

Roger D. Wintle (SBN 142484)
Jill Schachter (SBN 278100)
THE HERITAGE LAW GROUP, A P.C.
152 North Third Street
San Jose, California 95112
Tel: (408) 993-2100
Fax: (408) 993-2101

Attorney for Plaintiff
BRADFORD TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

BRADFORD TECHNOLOGIES, INC.,)	Case No. 3:11-CV-04621 (EDL)
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE CASE MANAGEMENT
v.)	CONFERENCE FOR 60 DAYS
)	AS MODIFIED
NCV SOFTWARE.com, et al.,)	
)	
Defendants.)	
)	

1 WHEREAS, the Court entered a Stipulated Order Regarding Defendants Karma
2 Technologies, LLC's And John David Biggers' Motion For An Order To Show Cause Why
3 Plaintiff, Jeffrey Bradford And Roger Wintle Should Not Be Held In Contempt of Court And For
4 Further Relief And Sanctions on December 6, 2012 (the "Sanctions Order");

5 WHEREAS, pursuant to the Sanctions Order, Defendants are conducting expedited
6 discovery concerning their three source code discs and the extent to which they were accessed,
7 reviewed, copied, downloaded and/or saved by Bradford Technologies, Inc., Jeffrey Bradford
8 and/or AppraisalWorld, Inc., in violation of the Stipulated Protective Order in this matter;

9 WHEREAS, in anticipation of the completion of the foregoing expedited discovery
10 within two (2) months, the Court scheduled a case management conference for February 19,
11 2013, at 10:00 a.m.;

12 WHEREAS, Defendants have not yet been able to complete the expedited discovery
13 contemplated by the Sanctions Order due, in part, to the fact that Defendants' retained,
14 independent expert was not given access to Mr. Bradford's personal laptop until January 21,
15 2013, to obtain a forensic image for analysis;

16 WHEREAS, Defendants' independent experts need additional time to complete their
17 analyses, and Defendants need additional time to schedule and conduct relevant depositions once
18 the experts finish their analyses;

19 WHEREAS, to permit Defendants sufficient time to conduct and complete their
20 expedited discovery, the parties wish to continue the case management conference scheduled for
21 February 19, 2013, by approximately sixty (60) days;

22 IT IS HEREBY STIPULATED and AGREED by and between the foregoing parties in
23 this matter, through their respective counsel of record, as follows:
24
25
26
27
28

23 at 3:00 p.m.

1 1. The case management conference should be continued until April ~~22~~, 2013, to
2 permit Defendants to complete the expedited discovery contemplated by the Sanctions Order,
3 and for their experts to complete their analyses.

4 2. Any party may request an order from the Court to expedite the case management
5 conference, or to otherwise seek expedited relief from Court, for good cause.

6
7 **IT IS SO STIPULATED.**

8 Dated: February 11, 2013

ANDERSON & KARRENBURG, P.C.

9
10 By: /s/ Heather M. Sneddon

11 - and -

12 GREENBERG TRAURIG, LLP
13 Kurt A. Kappes
14 Greg Sperla

15 Attorneys for Defendants
16 KARMA TECHNOLOGIES, LLC
JOHN DAVID BIGGERS

17 Dated: February 11, 2013

THE HERITAGE LAW GROUP

18
19 By: /s/ Jill Schachter

20 Attorneys for Plaintiff
21 BRADFORD TECHNOLOGIES, INC.

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23
24
25 Dated: February 11, 2013

